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April 13, 2018

VIA ECF

The Honorable Jesse M. Furman
U.S. District Court, Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: New York Wheel Owner LLC v. Mammoet-Starneth LLC, et al., No. 17-CV-4026
(JMF) (S.D.N.Y.)

Dear Judge Furman:

We write jointly on behalf of Plaintiff New York Wheel Owner LLC (“NYW”) and Defendants Mammoet USA North Inc., Mammoet USA Holdings, Inc. (a/k/a Mammoet Americas Holding, Inc.), Starneth LLC, Mammoet Holding B.V. and Starneth B.V. (the “non-Debtors”). On March 15, 2018, the Court extended the stay in this case to April 21, 2018 and ordered the parties to submit this joint letter to advise the Court on the status of Defendant Mammoet-Starneth LLC’s bankruptcy proceedings in the District of Delaware and any other material developments in the case.

On behalf of all parties, we respectfully request a further extension of the stay for an additional 30 days (*i.e.*, until May 21, 2018). As described in the parties’ last status update, the parties are continuing to work towards a settlement, but need some more time and believe that extending the stay will facilitate those discussions. If the Court is amenable to this request, we suggest providing a similar joint report one week before the expiration of the extended stay.

Respectfully submitted,

/s/ Anne Champion

Anne Champion

cc: All counsel of record